

August 31, 1999

Jack Connelly
Idaho Department of Fish and Game
1345 Barton Road
Pocatello, ID 83221

Dear Jack,

This letter is in regards to the proposed update of the "Guidelines for Management of Sage Grouse Populations and Habitats". We appreciate the opportunity to review and offer our comments on these proposed changes and additions.

We are pleased to see that wildlife management agencies have recognized that hunting sage grouse is additive, rather than compensatory. Many people have contended for quite awhile now that the longevity and low reproductive rates of sage grouse cannot be compared to other species such as quail and pheasants that may be short lived, but are very productive. Many populations can support hunting, but it makes little sense to add another obstacle, particularly during breeding activities, to a population that is struggling to survive.

We are also very pleased to see that juniper is recognized as a threat to sage grouse habitat and active control is recommended. In parts of southern Idaho, juniper is a serious threat to the health of our rangelands. These areas must be aggressively managed to maintain and improve range health. Managing heavy, closed, brush stands for more open, mosaic-patterned habitat will also benefit the grouse. In certain areas of our state, dense stands of mountain sagebrush and bitterbrush are limiting the usefulness of that habitat to brood rearing hens. Opening these stands up will encourage herbaceous diversity and subsequently insect diversity.

We are concerned with several of the recommendations regarding habitat management and restoration.

Breeding Habitat

Habitat Protection

- 2 & 3. Protection of habitat is suggested for 3.2 to >5 km depending on whether the habitat is uniformly distributed or not. This comment is very ambiguous and subjective. Range and habitat managers have, and continue to, struggle over this issue for some time. What is uniform? Does this refer to uniform stands of sagebrush with no mosaic pattern, or simply habitat that is uninterrupted by intensive farming, interstates, or urban sprawl? What does "protect" habitat mean? No brush manipulation at all, or does the protection allow for opening dense stands of brush to allow herbaceous vegetation to express itself?

Habitat restoration

1. Treating habitat on schedules and quotas is discouraged, but in #6 & 7 a schedule for treating and restoring rangelands is recommended.
4. Brush beating is recommended to open the sagebrush canopy to encourage herbaceous growth. It has long been recognized that brush beating is cost prohibitive and only marginally effective in controlling sagebrush. Often the brush is not killed and will resprout the following year and suppress the herbaceous vegetation within a couple of years.

- 6&7. As mentioned before, avoiding schedules and quotas is recommended, but here you are putting restoration treatments on 20-year schedules, and a percentage quota of the area to be treated. By establishing this schedule and quota, areas that are in need of treatment may be disallowed simply because the quota has been met. The recommended schedule and quota itself is too restrictive. In many places, large expanses of our rangeland is dominated by heavy, closed stands of sagebrush or mixed brushed species. In these stands the brush dominates the vegetation by suppressing the herbaceous understory. The only way we can reestablish good grass and forb production is to open these stands up. In cases where the understory has been reduced to annual grasses or weeds, the brush overstory will have to be removed to allow reseeding. If managers are restricted to ridiculously small treatment areas as suggested in #2, Winter Habitat-Habitat restoration, an already marginally cost effective restoration project will be totally so.
- 9&10 Same as above.
12. Claims that tebuthiuron have not been adequately researched in sage grouse habitat are weak. All the research completed to date on sagebrush control has been sage grouse habitat. Numerous examples, many in Idaho, have shown tebuthiuron to be very effective and safe in grouse habitat. If prescribed burning is to be limited as you suggest because it is unpredictable and hard to control, treatment with tebuthiuron is the only other logical method remaining.

Winter Habitat-Habitat restoration

2. Restricting prescribed burns to less than 50 ha is too restrictive. Practically speaking, it costs as much to treat a 50 ha project as a 1000 ha project. Management agencies, as you know, work on a very limited budget and must be as efficient as possible when planning projects as important and complicated as prescribed burns. Topography, personnel safety, and habitat needs of other species may require burns to be significantly larger. I realize burns >50 ha are to be “discouraged”, but often when decisions are to be made, a statement like this is used as a hard and fast line.

Our comments are not meant to discourage your work on the guidelines, but to point out inconsistency or impracticality we may see in their application. Your work on sage grouse has been very helpful and we support continued research in this area. If there is any way our department can be of assistance feel free to contact us.

Sincerely,

Dr. Robert Hillman

Administrator, Division of Animal Industries
ISDA